

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DMITRIY SHIROKOV, on behalf of himself
and all others similarly situated

Plaintiff,

v.

DUNLAP, GRUBB & WEAVER, PLLC; US
COPYRIGHT GROUP; THOMAS DUNLAP;
NICHOLAS KURTZ; GUARDALEY, LIMITED;
and ACHTE/NEUNTE Boll Kino
Beteiligungs Gmbh & Co KG,

Defendants.

Case: 1:10-cv-12043-GAO

**DEFENDANTS DUNLAP, GRUBB & WEAVER, PLLC'S, THOMAS DUNLAP'S, AND
NICHOLAS KURTZ'S SECOND RENEWED MOTION FOR SANCTIONS PURSUANT
TO FED. R. CIV. P. RULE 11**

Defendants Dunlap, Grubb & Weaver, PLLC, Thomas Dunlap, and Nicholas Kurtz respectfully submit this renewed motion for sanctions pursuant to Federal Rule of Civil Procedure Rule 11 in relation to Plaintiff's Second Amended Class Action Complaint. As grounds, the moving Defendants submit the accompanying memorandum of law.

Wherefore, the moving Defendants respectfully request that the Court impose appropriate sanctions pursuant to Federal Rule of Civil Procedure Rule 11 against Plaintiff, Dmitriy Shirokov, and his counsel, Booth Sweet LLP, Daniel G. Booth, and Jason E. Sweet, including but not limited to the striking of the plaintiff's claims in their entirety or alternatively against Defendants Dunlap Grubb & Weaver, PLLC, Thomas Dunlap and Nicholas Kurtz, as well as

reimbursement of the attorneys' fees and expenses Defendants have incurred, and for such other further relief that the Court deems just and proper.

The Defendants,
Dunlap, Grubb & Weaver, PLLC,
Thomas Dunlap, and Nicholas Kurtz
By their counsel,

/s/ Kara Thorvaldsen

George C. Rockas BBO# 544009
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Certificate Of Service

I, Kara Thorvaldsen, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). I am not aware of any party who is not a registered participant, and therefore electronic filing is the sole means of service of this document.

/s/ Kara Thorvaldsen